

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
:
UNITED STATES OF AMERICA :
:
- v. - :
:
WILLIAM ERDOGAN, :
:
Defendant. :
- - - - - X

INDICTMENT

22 Cr.

22 CRIM 033

COUNT ONE

(Possession with Intent to Distribute a Controlled Substance)

The Grand Jury charges:

1. On or about July 20, 2021, in the Southern District of New York and elsewhere, WILLIAM ERDOGAN, the defendant, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

2. The controlled substance involved in the offense were 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(A).)

COUNT TWO

(Distribution and Possession with Intent to Distribute a Controlled Substance)

The Grand Jury further charges:

3. On or about July 7, 2021, in the Southern District of

New York and elsewhere, WILLIAM ERDOGAN, the defendant, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

4. The controlled substance involved in the offense were 40 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(B).

(Title 21, United States Code, Sections 812, 841(a)(1), and (b)(1)(B).)

COUNT THREE

(Distribution and Possession with Intent to Distribute a Controlled Substance)

The Grand Jury further charges:

5. On or about July 1, 2021, in the Southern District of New York and elsewhere, WILLIAM ERDOGAN, the defendant, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

6. The controlled substance involved in the offense were 40 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(B).

(Title 21, United States Code, Sections 812, 841(a)(1), and (b)(1)(B).)

COUNT FOUR
(Firearms Use, Carrying, and Possession)

The Grand Jury further charges:

7. On or about July 1, 2021, in the Southern District of New York and elsewhere, WILLIAM ERDOGAN, the defendant, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the narcotics offense charged in Count Three of this Indictment, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

FORFEITURE ALLEGATION

8. As a result of committing the controlled substance offenses alleged in Counts One, Two, and Three of this Indictment, WILLIAM ERDOGAN, the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offenses and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

9. As a result of committing the firearms offense alleged in Count Four of this Indictment, WILLIAM ERDOGAN, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense, and including but not limited to a Ruger Tec-9-style semi-automatic pistol.

Substitute Asset Provision

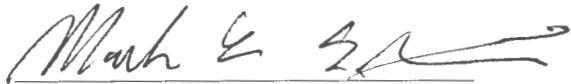
10. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

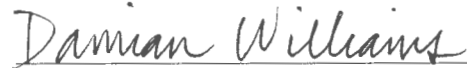
it is the intent of the United States, pursuant to Title 21,

United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)



FOREPERSON



DAMIAN WILLIAMS
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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(21 U.S.C. § 841; 18 U.S.C. §§ 2,
924(c).)

DAMIAN WILLIAMS
United States Attorney


Foreperson
